

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

MALEEHA AHMAD, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 4:17-cv-2455 CDP
	)	
CITY OF ST. LOUIS, MISSOURI,	)	
	)	
Defendant.	)	

**JOINT MOTION TO AMEND THE CASE MANAGEMENT ORDER**

The parties respectfully request that certain deadlines set by the Court as part of the Case Management Order (ECF No. 81) be postponed in light of the entry of new counsel for Defendant.

The deadline for Plaintiffs' disclosure of expert witnesses and provision of their expert reports is December 28, 2018, with said expert depositions being completed no later than January 18, 2019. ECF No. 81.

The deadline for Plaintiffs' motion for class certification is January 4, 2019, with any opposition due no later than February 1, 2019, and any reply filed by February 11, 2019. ECF No. 89.

The parties request that the deadline for disclosure of Plaintiffs' expert witness and their reports be extended through January 25, 2019, and that those expert depositions be completed no later than February 8, 2019.

The parties request that the deadline for Plaintiffs' motion for class certification be extended through February 1, 2019, with any opposition due February 22, 2019, and any reply due March 1, 2019.

Plaintiffs have noticed more than ten additional depositions starting on December 3 through December 21, 2018, in order to gather information necessary to meet the current expert disclosure deadline. Plaintiffs intend to notice additional depositions in advance of the deadline for the motion for class certification.

The attorney who had been representing Defendant in this matter resigned his position with the City Counselor's office (ECF No. 99) and was permitted to withdraw on November 26, 2018 (ECF No. 100). New counsel entered on November 28, 2018. ECF No. 101.

Newly entered defense counsel needs additional time to review the already extensive record in this case and the status of discovery, including discovery pending from plaintiffs. Further, defense counsel is also responsible for some 24 additional suits which have been filed against the City and its police officers by reason of similar issues raised by plaintiffs herein, and responsive pleadings in those actions (some of which involve plaintiffs formerly party to this action) are due in December. Finally, counsel has been required to study mediation and settlement matters, causing deferral of identification of potential experts for the defense. Plaintiffs are amenable to delaying depositions if the deadlines discussed in this motion are extended.

For these reasons, the parties request this Court extend the deadline for Plaintiffs' expert disclosure from December 28, 2018 to January 25, 2019; the time for completing depositions of Plaintiffs' experts from January 18, 2019 to February 8, 2019; the deadline for Plaintiffs' motion for class certification from January 4, 2019 to February 1, 2019; the opposition to any motion for class certification deadline from February 1, 2019 to February 22, 2019; and the deadline for any reply to the motion for class certification from February 8, 2019 to March 1, 2019.

Respectfully submitted,

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**Certificate of Service**

A copy of the foregoing filed via CM/ECF and thereby made available to all counsel of record on November 28, 2018.

/s/ Anthony E. Rothert